

FILED IN THE U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 04 2024

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON

United States District Court
Eastern District of Washington

Leland Owens

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

World Wrestling Entertainment, ~~my~~ Ultimate
Fighting Championship, Vince McMahon, Linda
McMahon & Stephanie McMahon

(In the space above enter the full name(s) of the defendant(s).
If you cannot fit the names of all of the defendants in the
space provided, please write "see attached" in the space
above and attach an additional sheet of paper with the full list
of names. The names listed in the above caption must be
identical to those contained in Section I. Do not include
addresses here.)

Case No. 1:24-cv-03179-TOR

(To be filled out by Clerk's
Office only)

COMPLAINT

Jury Demand?

☐ Yes

☐ No

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

If this is an employment discrimination claim or social security claim, please use a different form.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

I. PARTIES IN THIS COMPLAINT**Plaintiff**

List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff:

Owens Leland H
Name (Last, First, MI)

408 Skow Street
Street Address

Yakima Wapato
County, City

WA
State

98951
Zip Code

509-759-9799
Telephone Number

Defendant(s)

List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant 1: World Wrestling Entertainment - Headquarters
Name (Last, First)

707 Washington Blvd
Street Address

Stamford
County, City

CT
State

06901
Zip Code

Defendant 2: Ultimate Fighting Championship - Headquarters
Name (Last, First)

6650 S Torrey Pines DR
Street Address

Las Vegas
County, City

NV
State

89118
Zip Code

Defendant(s) Continued

Defendant 3: Vince McMahon Vince & Stephanie
Name (Last, First)
Same As Wwe HQ
Street Address

County, City State Zip Code

Defendant 4: McMahon Linda
Name (Last, First)
Unknown
Street Address

County, City State Zip Code

II. BASIS FOR JURISDICTION

Check the option that best describes the basis for jurisdiction in your case:

- ☐ **U.S. Government Defendant:** United States or a federal official or agency is a defendant.
- ☒ **Diversity of Citizenship:** A matter between individual or corporate citizens of different states and the amount in controversy exceeds \$75,000.
- ☐ **Federal Question:** Claim arises under the Constitution, laws, or treaties of the United States.

If you chose "Federal Question", state which of your federal constitutional or federal statutory rights have been violated.

III. VENUE

This court can hear cases arising out of the Eastern District of Washington.

Under 28 U.S.C § 1391, this is the right court to file your lawsuit if: (1) All defendants live in this state AND at least one of the defendants lives in this district; OR (2) A substantial part of the events you are suing about happened in this district; OR (3) A substantial part of the property that you are suing about is located in this district; OR (4) You are suing the U.S. government or a federal agency or official in their official capacities and you live in this district. Explain why this district court is the proper location to file your lawsuit.

Venue is appropriate in this Court because:

This ^{matter} ~~matter~~ Happened In my Hometown

IV. STATEMENT OF CLAIM

Place(s) of
occurrence:

408 Skow street Wapato, WA 98951

Date(s) of occurrence: *August 18th 2016*

State here briefly the FACTS that support your case. Describe how each defendant was personally involved in the alleged wrongful actions.

FACTS:

What
happened to
you?

I told Toppenish Police PD some things about some things that was said from Stephanie McMahon about my daughter "Marlee". The WWE ~~came~~ sent Daniel Bryan & Mercedes Varnado with some hush money in which I declined so they took some of my ideas for characters ^{After} EGOS, storylines, T-shirt designs, ~~also~~ also when asked what I was going to do with

my earnings; I stated I was going to start my own organization but adding MMA to it. I believe the McMahon's was trying to talk AS Agents with the intention of trying to get a decent discount. - I also gave TOPPENISH PD information about crimes - ~~and~~ Daniel & Mercedes was in between messages between Vince & I.

~~Was anyone else involved?~~

Was
anyone
else
involved?

Mercedes Varnado

Daniel Bryan.

Who did
what?

me & Vince Have A Verbal Agreement that when The
case was over we would talk about "TKO" But
He Already Started It; TKO IS MY COMPANY
Known AS P.I.E, He Also did Not Pay me for
my Ideas. We Also Have A Verbal Agreement About
Being Paid. I Reached out & Got No Response
EXCEPT From TKO. Vince Was supposed to Put
Money Away ^{for} me when I Reached out. I
did not want to do it this way. He
felt it was A Good Idea for Publicity
for Both Companies.

V. INJURIES

If you sustained injuries related to the events alleged above, describe them here.

Emotional - Stress, Anger, Disbelief

VI. RELIEF

The relief I want the court to order is:

☒ Money damages in the amount of: \$ 500,000,000

☒ Other (explain):

I Get The Rights To All MY Ideas and I want 1/2 of MY Ideas earnings. I want All MY unused Ideas Pulled. ~~to be~~ Cease and desist of "TKO".

Also MY Inventions are off limits. A List of All MY ~~ideas~~ ^{Ideas} used & unused. The used Ideas I still Get to use without Vince's ~~or~~ ^{or} The WW's say so. The person who uses MY Ideas gets some Rights AS well. I did give him one event to use for TKO But he has to say MY idea & MY company Throughout the event & I get 15% of The Proceeds. If All's Any of MY Ideas He has to Ask MY permission

VII. CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

10-10-24

Dated

Leland Owens

Plaintiff's Signature

Owens Leland H

Printed Name (Last, First, MI)

408 Skow Street

Address

Wapato

City

WA

State

98951

Zip Code

509-759-9799

Telephone Number

List the same information for any additional plaintiffs named. Attach additional sheets of paper as necessary.